

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION Council

In the Matter of
Application No. 2002-01

BP WEST COAST PRODUCTS, LLC

BP CHERRY POINT COGENERATION
PROJECT

NOTICE OF AVAILABILITY OF DRAFT
NOTICE OF CONSTRUCTION AND
DRAFT PREVENTION OF SIGNIFICANT
DETERIORATION (NOC/PSD) PERMIT
NO. EFSEC/2002-01 FOR PUBLIC
COMMENT;

NOTICE OF PUBLIC COMMENT
PERIOD: NOVEMBER 7
TO DECEMBER 12, 2003;

NOTICE OF PUBLIC HEARING:
DECEMBER 9, 2003, BLAINE,
WASHINGTON

PROJECT DESCRIPTION

On June 10, 2002, BP West Coast Products, LLC, submitted application No. 2002-01 to the Washington State Energy Facility Site Evaluation Council (EFSEC or Council) to construct and operate the BP Cherry Point Cogeneration Project (Project), a 720 megawatt (MW) natural gas fired, combined cycle combustion turbine cogeneration facility on 33 acres of land adjacent to the BP Cherry Point Refinery. The submittal included an application for a Notice of Construction/Prevention of Significant Deterioration (NOC/PSD) permit. Supplemental information was submitted on July 3, and August 29, 2002. In April 2003 a revised application was also submitted. The proposed Project would be located in Whatcom County approximately 6 miles (9.6 km) northwest of Ferndale and 7 miles (11 km) southeast of Blaine, Washington. Associated with the Project will be approximately 0.8 miles of 230-kV double circuit electrical distribution line to interconnect the facility with the Bonneville Power Administration (Bonneville) transmission system. The siting of the transmission line and the associated interconnection to the transmission system is under the jurisdiction of Bonneville.

EFSEC and Bonneville are conducting an environmental review of the Project, and issued a joint draft Environmental Impact Statement (DEIS) for public comment under the Washington State Environmental Policy Act (SEPA) and the National Environmental Policy Act (NEPA) on September 5, 2003. A final EIS will be issued following the close of EFSEC's adjudicative proceeding.

The Project would consist of : three General Electric 7FA combustion gas turbines (CGTs), each with its own 174 MW electric generator, and each turbine having an annual average capacity rating of 1,614 million British thermal units per hour (mm Btu/hr); three heat recovery steam generators (HRSG) each with a supplemental duct firing burner with a maximum rating of 105 mm Btu/hr; one steam driven turbine with a 243 MW electric generator (STG); one 1,500 KW diesel fueled emergency generator; one 265 hp diesel fueled firewater pump. The Project will use a water cooled steam condensation system.

Natural gas will be the only fuel for the combustion turbines and duct burners. On-road specification diesel will be the only fuel for the emergency generator and firewater pump.

The Project would provide base load electric service and operate year round except for maintenance. The Project will supply a maximum of approximately 510,000 pounds per hour (lb/hr) of steam and about 85 MW of power to the refinery.

PRELIMINARY DETERMINATION

The Council has been delegated the authority under Chapter 40 Code of Federal Regulations (CFR) Part 52 to issue permits under the Prevention of Significant Deterioration (PSD) program.

Under the authority vested in it by Chapter 80.50 Revised Code of Washington (RCW), the Council also issues Notice of Construction permits for facilities under its jurisdiction according to the procedures set forth in Chapter 463-39 of the Washington Administrative Code (WAC). To comply with procedural requirements, a draft PSD and NOC permits and technical support document (fact sheet) have been prepared to satisfy pertinent requirements, and are being issued for Council and public consideration. The issuance of this draft PSD/NOC permit and technical support document should in no way be taken to represent future conclusions, conditions or recommendations to the Governor of Washington State by the Council.

This notice serves as the Council's official notification that draft PSD/NOC permit has been issued, and is available for public inspection and comment. It also serves as notice that members of the public and interested parties have an opportunity to submit written comments to the Council on the draft PSD/NOC permit.

The Project is subject to permitting requirements under the federal requirements of 40 CFR 52.21 for emissions of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), sulfuric acid mist (H₂SO₄), particulate matter (PM), particulate matter less than 10 micrometers (PM₁₀), and volatile organic compounds (VOC).

The Project is subject to emission limitation, monitoring and reporting requirements of New Source Performance Standards (NSPS) 40 CFR 60 Subpart Db, 40 CFR 60 Subpart GG, Chapter 173-400 WAC, 40 CFR 60 Appendices A, B, and F, and 40 CFR 75; and to gas fuel monitoring requirements under 40 CFR 60.334(b)(2) and 40 CFR Part 75 Appendix D.

Ammonia (NH₃) emissions from the Project are subject to permitting under the requirements of WAC 463-39-005(1) and 005(4), which adopt Chapters 173-400 and 173-460 WAC respectively.

After reviewing the NOC/PSD application, the accompanying BACT evaluation, and additional supporting evaluations submitted by BP West Coast Products, LLC, the Council's permit writer has made a preliminary determination that all requirements for PSD, New Source Review, and NOC are satisfied, and that if the draft approval of the permit was approved, the emission units would comply with all applicable federal and state new source performance standards.

BACT as required under 40 CFR 52.21(j) and WAC 173-400-113 (2) and toxic best available control technology (T-BACT) as required under WAC 173-460-040 (4) would be used for the control of all air pollutants which would be emitted by the proposed Project. Turbine BACT control technology would consist of: use of an oxidation catalyst plus lean premix turbine burners for control of CO and VOCs; use of natural gas fuel and good combustion practice for control of PM/PM₁₀, SO₂ and sulfuric acid mist; Selective Catalytic Reduction (SCR) plus lean premix dry low NO_x turbine burners and low NO_x duct burners for the control of NO_x; and limitation of ammonia emission rate to 5 parts per million (ppm) averaged over 24 hours.

BACT for the emergency generator and firewater pump engines would require that the engine be new and meet the 40 CFR 89 federal engine standards for the year of engine purchase, use of diesel fuel that meets the sulfur content specification of on road diesel fuel at the time of fuel purchase, and operation of no more than 250 hours per year for each unit. BACT for the cooling tower would require installation of a demister guaranteed to have a drift loss of less than 0.001% of the recirculating water flow rate.

ENVIRONMENTAL IMPACT

The Council's permit writer has determined that allowable emissions from the proposed emission units, in conjunction with all other applicable emission increases or reductions (including secondary emissions) would not cause or contribute to violation of any ambient air quality standard or any applicable maximum allowable increase (PSD increment) over the baseline concentration in any area.

Ambient Impact Analysis indicates the Project will have no adverse impact from pollutant deposition on soils and vegetation in the following Class I areas: the North Cascades National Park, the Glacier Peak Wilderness Area, the Pasayten Wilderness Area, and the Alpine Lakes Wilderness Area. The Federal Land Managers (FLMs) use a 5% visibility impact as their threshold for possible concern. A 6% visibility impact was predicted for the Olympic National Park on one day per year. The National Park Service considered this acceptable.

Ambient Air Quality modeling indicates that projected concentrations of pollutants will be below levels that require further impacts analysis or air monitoring.

Use of cogeneration steam is expected to result in emissions reductions at the refinery. These refinery emissions reductions were not relied upon for the cogeneration power plant's emissions impacts analysis or emissions permitting.

The emissions of toxic air pollutants from this facility will not exceed any acceptable source impact level (ASIL) established under WAC 173-460-150 or 160.

PUBLIC COMMENT

The Draft Approval of PSD/NOC Permit No. EFSEC/2002-01 and the corresponding technical support document (a supplement to the permit to provide more detailed information) are available for review during the public comment period at the following locations:

Washington State Library
Joel M. Pritchard Library
Point Plaza East
6880 Capitol Blvd
Tumwater, WA, 98504-2460
(360) 704-5200

Energy Facility
Site Evaluation Council
925 Plum Street SE, Building 4
Olympia, WA, 98504-3172
(360) 956-2121
www.efsec.wa.gov

Whatcom County Library
610 Third Street
Blaine, WA 98230

Whatcom County Library
P.O. Box 1209
Ferndale, WA 98248

Bellingham Library
210 Central Avenue
Bellingham, WA 98225-4421

Semiahmoo Library
#200 1815 152 Street
Surrey, BC V4A 9Y9
Canada

White Rock Public Library
15342 Buena Vista Avenue
White Rock, BC V4B 1Y6
Canada

Washington State Department
of Ecology
300 Desmond Drive
Lacey, Washington, 98503
Please contact Robert Burmark
at (360) 407-6812.

Copies of the documents will also be mailed to persons or agencies upon request.

The public comment period will extend from November 7 through December 12, 2003. Interested persons may review the documents and submit written comments regarding the proposed permit to: Allen Fiksdal, EFSEC, PO Box 43172, Olympia, WA 98504-3172, or by e-mail to efsec@ep.cted.wa.gov. **Written comments must be postmarked no later than December 12, 2003.** EFSEC requests that comments not be sent by fax. EFSEC will also accept written comments submitted in person at the December 9, 2003, public hearing (see below).

All persons, including the applicant, who believe any condition of these draft permits are inappropriate must raise all reasonably ascertainable issues and submit all reasonably available arguments supporting their position in writing by the end of the comment period. Any supporting materials which are submitted must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this proposed approval or are generally available reference material.

A final determination on this PSD/NOC permit approval will not be made until after the public comment period, and until all comments received pursuant to this notice have been considered. Once the final determination is made on this PSD/NOC permit approval, a copy of the Council's final determination regarding the proposed amendment will be filed for review at the locations above. Within 30 calendar days after the final decision has been issued, any person who commented on the draft approval may petition the EPA Administrator, under 40 CFR 124.19, to review any condition of the decision. Any person who failed to file comments or failed to participate in the public hearing on the draft may petition for administrative review only to the extent of the changes from the draft to the final approved decision.

PUBLIC HEARING

A public hearing on this matter will be held at the following date, time and location:

Tuesday December 9, 2003 – Starting at 7:00 PM
Blaine Performing Arts Center
975 H Street, Blaine, Washington, 98230

The hearing will be conducted in accordance with the Administrative Procedures Act, Chapter 34.05 Revised Code of Washington.

ADDITIONAL INFORMATION

More specific information about the Project is available from EFSEC's office or from reviewing the application at the public libraries in Olympia, WA, Whatcom County, WA and Surrey, and White Rock, British Columbia, listed above. Information regarding the Project is also on EFSEC's Internet site at: <http://www.efsec.wa.gov>.

Please bring this Notice to the attention of persons who you know would be interested in this matter.

For more information, or if you have special accommodation needs, contact Irina Makarow at 360/956-2047 (Voice) or 360/586-4224 (TDD).

WASHINGTON ENERGY FACILITY SITE EVALUATION COUNCIL

Dated in Olympia, Washington, this 7th day of November, 2003.

By: Allen J. Fiksdal, EFSEC Manager
PO Box 43172
Olympia, Washington 98504-3172